

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF TN, MEMPHIS

Brent A Rowan
BBA in Finance
Minor in French
(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

Social Security Admin.
Ticket to Work Program
(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff Brent A Rowan, BBA
(name of plaintiff)

is a citizen of the United States and resides at P O Box 41963
(street address)

Memphis US TN
(city) (country) (state)

38174-1963 901 287 9473
(zip code) (telephone number)

3. Defendant

Social Security Administration
 (defendant's name)
 lives at, or its business is located at 1330 Monroe Avenue
Memphis, TN 38104
 (street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at

1330 Monroe Avenue
 (street address)
Memphis US TN 38104
 (city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about

11th June 2012
 (day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about

01 July 2012
 (day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about

01 July 2012
 (day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 15 July 2012 (Attach a copy of the notice to this complaint.)
 (day) (month) (year)9. Because of plaintiff's (1) ☒ race, (2) ☒ color, (3) ☒ sex, (4) ☒ religion, (5) ☒ national origin, defendant(a) ☒ failed to employ plaintiff.(b) ☐ terminated plaintiff's employment.(c) ☐ failed to promote plaintiff.

(d) failed to schedule an interview with plaintiff
after a review with a specialist at the
Memphis Area Career Center. Who is
the employment advisor at the SSA in Memphis, TN.

10. The circumstances under which defendant discriminated against plaintiff were as follows: I received no information about the ticket to work program after submitting several requests with a coordinator at the TN Fair Employment Commission. The ticket to work program is a program for those who are disabled according to the Social Security Administration. The ticket to work program is not active according to my case. How do I enroll into the ticket to work program?

11. The acts set forth in paragraph 9 of this complaint

- (a) ☒ are still being committed by defendant.
- (b) ☐ are no longer being committed by defendant.
- (c) ☒ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ☒ Defendant be directed to employ plaintiff, or
- (b) ☐ Defendant be directed to re-employ plaintiff, or
- (c) ☐ Defendant be directed to promote plaintiff, or;
- (d) ☒ Defendant be directed to accommodate plaintiff according to his disabilities. Why?

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes (☒) No (☐)


SIGNATURE OF PLAINTIFF